

KEITH INGRAM

4/23/2014

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NUMBER
	)	2:13-cv-193 (NGR)
RICK PERRY, et al.,	)	
	)	
Defendants.	)	

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ORAL DEPOSITION OF

KEITH INGRAM

APRIL 23, 2014

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ORAL DEPOSITION OF KEITH INGRAM, produced as a witness at the instance of PLAINTIFF UNITED STATES OF AMERICA and duly sworn, was taken in the above-styled and numbered cause on the 23rd day of April, 2014, from 9:02 a.m. to 6:13 p.m. before TEENA L. HARMON-DAVIS, a Certified Shorthand Reporter in and for the State of Texas, reported by machine shorthand at the offices of Dechert LLP, 300 West Sixth Street, Suite 2010, Austin, Texas, pursuant to the Federal Rules of Civil Procedure and/or the provisions stated on the record or attached hereto.

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1 combination form.

2 A. Sure. Yeah, C says that if in making a  
3 determination under this subsection an election officer  
4 determines under standards adopted by the Secretary of  
5 State that the voter's name --

6 THE REPORTER: Would you slow down.

7 A. I'm sorry. I think the reading is boring, so I  
8 try to go through it quickly.

9 If in making a determination under this  
10 subsection the election officer determines under  
11 standards adopted by the Secretary of State that the  
12 voter's name on the documentation is substantially  
13 similar to, but does not match exactly with, the name on  
14 the list, the voter shall be selected for voting under  
15 subsection (d) if the voter submits an affidavit stating  
16 that the voter is the person on the list of registered  
17 voters.

18 Q. And I think starting in 2011, and probably  
19 continuing for a while, various people, including  
20 counties, raised concerns about the procedure that was  
21 going to be necessary to implement that.

22 A. Well, I don't know --

23 Q. The actual signing of an affidavit.

24 A. Sure. And I don't know exactly what concerns  
25 might have been raised in that regard from counties

1 because I arrived in the office on January 5, 2012, and  
2 the folks who were here before that aren't here anymore.  
3 But I will say that when I arrived the proposed form of  
4 the affidavit was a separate piece of paper that was --  
5 looked like an affidavit.

6 Q. Going to be actually notarized.

7 A. Well, the election judge has the discretion of  
8 a district court judge on election day, and so the  
9 election judge would be the one that would be actually  
10 attesting to all these signatures. But it would be a  
11 very troublesome process to have a separate piece of  
12 paper in the election kit that would now have to be used  
13 for who knows how many voters, and because of the power  
14 of the election judge to witness signatures I asked  
15 Elizabeth Winn at the time, why can't we just put this on  
16 the combo form; they used to -- before SB 14 they used to  
17 have to sign an affidavit that you've lost your  
18 certificate if you show up to vote with another form of  
19 ID besides your certificate, and that was on the combo  
20 form, why can't we do this that way. And I talked to  
21 Steve Rayburn in Tarrant County. He thought that would  
22 be a much better way to handle it, so that is what we  
23 started working toward with changing the combo form to  
24 add that as a place for the voter to initial. And  
25 Harris County wanted to use their own version of the

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1 He can give you the ultimate implementation decision, you  
2 know, but in terms of giving the discussions I'm going to  
3 instruct him not to answer.

4 A. They strongly supported the effort.

5 Q. Did you have discussions with anyone in the  
6 Governor's Office concerning any locations of the mobile  
7 EIC units?

8 A. I don't believe so.

9 Q. Do you know if anyone in your office did?

10 A. I don't believe so.

11 Q. Do you know if anyone in your office other than  
12 yourself had discussions with anyone in the Governor's  
13 Office concerning implementation of SB 14?

14 A. Yes.

15 Q. And who was that?

16 A. Our general counsel, Wroe Jackson, and our  
17 deputy secretary of state, Coby Shorter, as well as  
18 Secretary Steen.

19 Q. And were you privy to those discussions?

20 A. I was privy to the ones that I was privy to.  
21 I don't know if I was privy to all of them.

22 Q. Were you aware of what the subject matters are  
23 of the discussions where you were not privy?

24 A. I don't know what I don't know.

25 Q. Meaning did they tell you after the



1 discussions?

2 A. I think that our -- our discussions with the  
3 Governor's Office regarding the implementation of photo  
4 ID centered around the interpretation of the secretary's  
5 office about the list of acceptable IDs and the mobile  
6 EIC unit program.

7 Q. So other than those two issues, as far as  
8 you're aware no one in your office had discussions with  
9 anyone in the Governor's Office concerning the  
10 implementation of SB 14?

11 A. We could have. I'm not sure about this, but  
12 our office could have communicated with the Governor's  
13 Office about voter education in the fall of 2013 and  
14 funds to pay for that effort.

15 Q. And when you say you could have, you mean you  
16 think you might have or you --

17 A. I don't know if that was the case or not. If  
18 it was, it would have been communication with  
19 Mike Morrissey in the Governor's Office.

20 Q. And who would have had that communication?

21 A. Mr. Jackson and Mr. Shorter.

22 Q. One last question I have -- I don't know if  
23 anyone else has any follow-up. In your -- in your view,  
24 in the construction of SB 14, the education program that  
25 is mandated by the statute, does it specifically mandate